

Smith, Corey (TAX)

From: Block, Samantha <samantha.block@akingump.com>
Sent: Tuesday, August 17, 2021 9:38 PM
To: Smith, Corey (TAX)
Cc: Langston, Lee F. (TAX); MacDougall, Mark; Petree, Nicholas
Subject: United States v. Brockman, Case No. 4:21-cr-00009

Mr. Smith,

We intend to file a motion in *United States v. Brockman*, pursuant to Rule 17(c), asking the Court to (a) quash the subpoena to the extent it calls for Dr. Yudofsky to appear at the September 13 hearing and (b) modify the subpoena, to the extent it calls for production of documents beyond medical records and outside the scope of the subpoena. The Local Rules require non-parties filing motions to meet and confer—"to the extent possible." Based on the extensive correspondence over the past ten days, wherein the government has unequivocally rejected the specific relief we are seeking through this motion, we believe that the equivalent of a formal pre-hearing conference is cumulative and unnecessary. If you disagree, please communicate your position promptly as we expect to file this motion without further delay.

Best,
Sammy

Samantha Jennifer Block
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